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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA	:	Hon. James B. Clark, III
	:	
v.	:	Mag. No. 18-3056
	:	
RUDOLF SZORADI	:	<b>CRIMINAL COMPLAINT</b>

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I, Brandon M. Lackey, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:


SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B


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continued on the attached page and made a part hereof.

  
Brandon M. Lackey, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
March 27, 2018 at Newark, New Jersey

HONORABLE JAMES B. CLARK, III  
UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**  
**(Kidnapping)**

On or about December 15, 2017, in Essex County, in the District of New Jersey, and elsewhere, defendant

RUDOLF SZORADI

did unlawfully and willfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away, and hold for ransom and reward and otherwise Victim-1, and, in committing or in furtherance of the commission of the offense, did willfully transport Victim-1 in interstate commerce from New Jersey to North Carolina.

In violation of Title 18, United States Code, Section 1201(a)(1).

**COUNT TWO**  
**(Transportation of a Stolen Vehicle)**

On or about December 15, 2017, in Essex County, in the District of New Jersey, and elsewhere, defendant

RUDOLF SZORADI

did unlawfully transport in interstate commerce a stolen motor vehicle, that is, a 2006 Ford Expedition, with the last four digits of the true Vehicle Identification Number assigned to that vehicle being 4501, from the State of New Jersey to the State of North Carolina, knowing the same to be stolen.

In violation of Title 18, United States Code, Section 2312.

**COUNT THREE**  
**(Interstate Domestic Violence)**

On or about December 15, 2017, in Essex County, in the District of New Jersey, and elsewhere, defendant

RUDOLF SZORADI

caused Victim-1, an intimate partner and dating partner, to travel in interstate commerce by force, coercion, duress, and fraud, and while in the course of, and as a result of, and to facilitate such conduct and travel, committed and attempted to commit a crime of violence against Victim-

1, namely kidnapping and assault, and caused Victim-1 serious bodily injury using a dangerous weapon, namely, a knife.

In violation of Title 18, United States Code, Sections 2261(a)(2), and 2261(b)(3).

**COUNT FOUR**  
**(Interstate Violation of Protection Order)**

On or about December 15, 2017, in Essex County, in the District of New Jersey, and elsewhere, defendant

RUDOLF SZORADI

caused Victim-1 to travel in interstate commerce by force, coercion, duress, and fraud, and in the course of, as a result of, and to facilitate such conduct and travel, engaged in conduct that violated a portion of a 2017 Order of Protection previously issued by a state court in the United States, that ordered defendant to stay away from Victim-1, refrain from communicating with Victim-1, and refrain from assaulting, strangling, forcibly touching, threatening, or committing any criminal offense against Victim-1, and caused Victim-1 serious bodily injury using a dangerous weapon, namely, a knife.

In violation of Title 18, United States Code, Sections 2262(a)(2) and 2262(b)(3).

**ATTACHMENT B**

I, Brandon Lackey, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with witnesses and other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. In 2017, a state court in the United States executed an Order of Protection requiring defendant RUDOLF SZORADI to stay away from and not assault or otherwise contact a person with whom he had a previous romantic relationship and had previously assaulted ("Victim-1"). The Order of Protection remained in force as of December 15, 2017.

2. In violation of that Order of Protection, on or around December 2017, defendant RUDOLF SZORADI took Victim-1 to a residence in Essex County, New Jersey, where a relative of defendant RUDOLF SZORADI's lived.

3. On or about December 15, 2017, in the basement of the residence, defendant RUDOLF SZORADI assaulted Victim-1. Specifically, while Victim-1 was on the ground, defendant RUDOLF SZORADI repeatedly choked Victim-1, and punched and kicked Victim-1 in the face. Defendant RUDOLF SZORADI also jabbed Victim-1 on the side of Victim-1's back with a knife.

4. Victim-1 made numerous attempts to escape, but each time, defendant RUDOLF SZORADI placed his knees and the weight of his body on top of Victim-1, and began to assault Victim-1 again. Victim-1 screamed for help, but no one came.

5. As he assaulted Victim-1, defendant RUDOLF SZORADI accused Victim-1 of "cheating" on him, and called Victim-1 a "fucking cheater," among other obscenities. Defendant RUDOLF SZORADI told Victim-1 that he was going to mutilate Victim-1's "private parts" so that Victim-1 could not have sex with anyone else.

6. Defendant RUDOLF SZORADI demanded that Victim-1 tell him who Victim-1 was "cheating" on him with, and threatened that if Victim-1 did not provide defendant RUDOLF SZORADI with this information, he would kill Victim-1. Defendant RUDOLF SZORADI told Victim-1 that he was going to take Victim-1 to the Everglades in Florida to "finish" Victim-1.

7. Later on December 15, 2017, after he had assaulted Victim-1, defendant RUDOLF SZORADI put Victim-1 in the back seat of a 2006 Ford Expedition (the "Ford Expedition") belonging to another relative of defendant RUDOLF SZORADI.

8. Using a string of Christmas tree lights and other restraints, defendant RUDOLF SZORADI tied up the arms and feet of Victim-1 so that Victim-1 could not escape from the Ford Expedition.

9. Defendant RUDOLF SZORADI did not have permission to take the Ford Expedition. The owner of the Ford Expedition reported it stolen to law enforcement.

10. Later on December 15, 2017, defendant RUDOLF SZORADI drove the Ford Expedition—with Victim-1 tied up in the back seat—south toward Florida, crossing numerous state lines.

11. Based on toll pass records, the Ford Expedition crossed from New Jersey into Delaware on or about December 15, 2017 at approximately 5:53PM.

12. While driving through North Carolina, Victim-1 convinced defendant RUDOLF SZORADI to take Victim-1 to the hospital.

13. Defendant RUDOLF SZORADI agreed, but told Victim-1 that Victim-1 would first need to conceal the extent of Victim-1's injuries, so that people would not know what defendant RUDOLF SZORADI had done to Victim-1.

14. On or about December 16, 2017, defendant RUDOLF SZORADI drove Victim-1 to a "Super 8" hotel in Garner, North Carolina. Surveillance video shows defendant RUDOLF SZORADI and Victim-1 arrive to the hotel in the Ford Expedition.

15. Based on hotel records, defendant RUDOLF SZORADI registered for the hotel room in his own name and listed a "Ford truck" on the registration form. Surveillance video from the hotel shows defendant RUDOLF SZORADI asking a hotel employee to rent a room for a few hours, to use the shower. The surveillance video also showed defendant RUDOLF SZORADI asking for a discount on the hotel room because he needed money to "get to Florida." Surveillance video later shows defendant RUDOLF SZORADI removing the landline phone from the hotel room.

16. On or about December 16, 2017, defendant RUDOLF SZORADI drove Victim-1 to a nearby hospital in Clayton, North Carolina. Surveillance video from the hospital shows defendant RUDOLF SZORADI and Victim-1 arrive to the hospital in the Ford Expedition.

17. As defendant RUDOLF SZORADI walked toward the emergency room entrance, he dropped an object into a trash can. Surveillance video captured defendant RUDOLF SZORADI discarding the object, and law enforcement later recovered a knife from that location.

18. At the hospital, Victim-1 was treated for serious injuries, including multiple knife punctures and hand lacerations, facial and neck trauma, multiple contusions, and blackened eyes.

19. Authorities arrested defendant RUDOLF SZORADI at the hospital. In a post-arrest statement, defendant RUDOLF SZORADI admitted that he "hurt" Victim-1. Defendant RUDOLF SZORADI's statements were video recorded.